

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

The Honorable Barbara S. Jones

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requirement of home detention.¹ Mr. Bitar has in fact remained confined to his home without incident for the last ten weeks.

With the government's consent, we now request that Mr. Bitar's bail conditions be modified (or, in light of uncertainty on this point, clarified) to permit him to leave his residence without prior permission between the hours of 9:00 a.m. and a 9:00 p.m. curfew. Should he wish to leave his home outside those hours, Mr. Bitar will continue to request permission from his supervising pre-trial services officer, and all other conditions of his bail will remain unaffected.

If the Court has any questions, we are happy to address them. If the modification proposed is acceptable, we respectfully request that Your Honor "So Order" this letter so that we may provide a copy to pre-trial services.

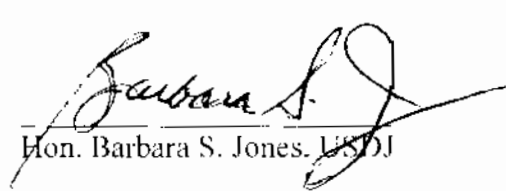
Thank you.

Respectfully submitted.


John F. Baughman

cc: AUSA Niketh Velamoor
AUSA Arlo Devlin Brown

SO ORDERED:


Hon. Barbara S. Jones, USBJ

9-19-12

¹ The agreed upon bail package presented to Judge Engelmeyer did not include a reference to home detention, but the bond signed by the defendant and the government does.